

Remarks

This Application has been carefully reviewed in light of the Office Action mailed May 7, 2003. Applicant believes all pending claims are allowable over the prior art of record without amendment and presents the following remarks in support. Applicant respectfully requests reconsideration and allowance of all pending claims.

The Claims are Allowable over *Chow* and *Wimble*

The Examiner rejects Claims 1-56 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,226,693 to Chow et al. ("*Chow*") and further in view of U.S. Patent 5,778,230 to Wimble et al. ("*Wimble*"). Applicant respectfully disagrees.

Chow merely discloses an event manager using a mapping table to map platform dependent physical events to logical events to allow platform independent callbacks. (Figure 7; Column 6, Lines 50-57; Column 7, Lines 5-8; Column 7, Line 62 – Column 8, Line 46) However, *Chow* contains no disclosure, teaching, or suggestion of a logical event manager operating in cooperation with a separate physical event manager as recited in independent Claim 1. The Examiner even acknowledges that the single event manager of *Chow* can be interpreted as "the hub of all the event management objects namely logical and physical events." (Office Action, Page 2)

As the Examiner acknowledges, *Chow* fails to disclose, teach, or suggest a physical event manager, in communication with but separate from a logical event manager, that comprises "a first mapper operable to translate between the logical event manager and the first event producer-consumer" and "a second mapper operable to translate between the logical event manager and the second event producer-consumer" as recited in independent Claim 1.

Accordingly, *Chow* is wholly inadequate as a reference against independent Claim 1.

Wimble discloses a debugging system that includes a Logical to Physical Manager that maps a physical event into a set of logical events. (Abstract; Column 1, Lines 15-18; Column 10, Line 63-Column 11, Line 2; Column 11, Lines 24-29; Column 12, Lines 46-51) However, *Wimble* contains no disclosure, teaching, or suggestion of a logical event manager

operating in cooperation with a separate physical event manager as recited in independent Claim 1. *Wimble* also fails to disclose, teach, or suggest a physical event manager that is in communication with "a first and a second event producer-consumer" and that comprises "a first mapper operable to translate between the logical event manager and the first event producer-consumer" and "a second mapper operable to translate between the logical event manager and the second event producer-consumer" as recited in independent Claim 1.

As an example, the references relied upon by the Examiner fail to provide any motivation to modify *Wimble* as suggested by the Examiner. The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification. *In re Fritch*, 972 F.2d 1260, U.S.P.Q.2d 1780 (Fed. Cir. 1992). The Examiner argues:

It would have been obvious to one having ordinary skill in the art at the time the invention was made to have incorporated the physical event manager comprises: a first mapper operable to translate between the logical event manager and the first event producer consumer; and a second mapper operable to translate between the logical event manager and the second event producer consumer as taught by *Wimble* in the method of *Chow* to increase the functionality of the system by making it more versatile.

(Office Action, Page 3) As clearly illustrated in Figure 13, *Wimble* merely discloses a Logical to Physical Manager that is in communication with a single primitive event object and thus performs only one type of mapping. (See Column 10, Lines 43-44) Accordingly, *Wimble* has no need for a first mapper and a second mapper as recited by Claim 1, and thus *Wimble* provides no motivation for the modification suggested by the Examiner.

Accordingly, *Wimble* is also inadequate as a reference against independent Claim 1. Thus, even assuming for the sake of argument that there was the required suggestion or motivation to combine *Chow* with *Wimble* as the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest the limitations specifically recited in independent Claim 1.

Applicant respectfully requests reconsideration and allowance of independent Claim 1, together with all of its dependent claims. Independent Claims 9, 13, and 19 recite certain limitations similar to those recited in independent Claim 1 with respect to the cooperative

operation of the physical event manager, including its mappers, and the logical event manager.¹ Accordingly, Applicant respectfully requests reconsideration and allowance of independent Claims 9, 13, and 19, together with all of their dependent claims.

¹ Applicant does not necessarily agree with the Examiner's statement that Claims 12-13, 18-19, and 22 "have the same limitations" as Claim 1. (Office Action, Pages 4-5)

Conclusion

Applicant has made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicant respectfully requests full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, the Attorney for Applicant, at the Examiner's convenience at (214) 953-6812.

Applicant believes that no fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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